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AT SEATTLE
CLERK U.S. DISTRICT COURT
BY WESTERN DISTRICT OF WASHINGTON
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

KIMBERLY HIRSCHKORN,

Defendant.

NO. CR 11-91 JCC

INFORMATION

(FELONY)

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1

(29 U.S.C. § 501(c) - Embezzlement of Labor Union Assets)

At all times relevant to this Information:

1. American Postal Workers Union Local Union 709 ("APWU Local 709") was a labor organization as defined in Sections 3(i) and (j) of the Labor-Management Reporting and Disclosure Act of 1959 ("LMRDA"), 29 U.S.C. § 401, *et seq.*, and was

1 engaged in an industry affecting interstate and/or foreign commerce. APWU Local 709
2 has filed a Labor Organization Annual Report ("LM-3 Report") on an annual basis,
3 without protest, since 1974. It is located in Bellingham, Washington.

4 2. During 2009, KIMBERLY HIRSCHKORN was an officer of APWU Local
5 709, namely, the Secretary-Treasurer of that organization.

6 3. While acting as Secretary-Treasurer of APWU Local 709, HIRSCHKORN
7 was not authorized to use Local 709's moneys, funds, and assets for private or personal
8 purposes. Specifically, she was not authorized to use Local 709's checks to disburse
9 funds to herself to make personal purchases and pay personal debts. She was not
10 authorized to withdraw funds from bank accounts belonging to Local 709 to make
11 personal purchases or pay for personal debts and expenses.

12 4. While acting as Secretary-Treasurer of APWU Local 709, in 2009,
13 KIMBERLY HIRSCHKORN willfully, with fraudulent intent, unlawfully embezzled,
14 stole, and converted to her personal use the moneys, funds, and assets of APWU Local
15 709. HIRSCHKORN wrote and cashed not fewer than 80 unauthorized checks to herself
16 and made not fewer than three unauthorized cash withdrawals for her own benefit, from
17 bank accounts belonging to LU 709.

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5. The total amount of the funds unlawfully and willfully stolen and

embezzled by KIMBERLY HIRSCHKORN from APWU Local 709 in 2009, while acting as Secretary-Treasurer of that Local, was \$23,360.89.

All in violation of Title 29, United States Code, Section 501(c).

DATED this 22nd day of March, 2011.

for 
JENNY A. DURKIN
United States Attorney


ANDREW C. FRIEDMAN
Assistant United States Attorney


DARWIN P. ROBERTS
Assistant United States Attorney